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Area-Wide Soil Contamination Task Force – Meeting 9 March 6, 2003, SeaTac, WA

Meeting Summary

The Area-Wide Soil Contamination Task Force met for the ninth time on March 6, 2003 in SeaTac. The objectives of this meeting were to:

- Review and refine the draft Task Force findings and recommendations on nature and extent of area-wide soil contamination, commercial areas, child-use areas, and residential areas.
- Discuss an alternative route through the Model Toxics Control Act (MTCA) for area-wide soil contamination areas and how the Task Force's recommendations would be interpreted in the current MTCA framework.
- Discuss approaches for responding to area-wide soil contamination at vacant land.
- Review the proposal and schedule for public involvement for the project.

Overview of Areas of Task Force Convergence

Elizabeth McManus of Ross & Associates gave an overview of the areas of emerging Task Force convergence and the progress the Task Force has made in answering the questions in its charter and the map of the project. Overall, the Task Force has almost completed answering questions about the nature and extent of contamination, has made considerable progress outlining recommended activities and implementation strategies, and has started identifying potential funding sources for the activities. The main areas of Task Force convergence thus far may be summarized as follows.

1. Low-to-moderate levels of arsenic and lead are present in soil in many areas of the state, and although concentrations are highly variable, certain areas have a greater likelihood of having elevated levels of arsenic and lead in soil based on their proximity to historical sources.
2. Information about the locations of area-wide soil contamination should be communicated to the public through two tiers of maps and accompanying information—large-scale maps for tier 1 and more detailed smaller-scale maps for tier 2. Information gathering should continue where current data are not sufficient to create appropriate maps, and maps should be developed or updated as data become available.
3. The foundation of the Task Force's recommendations is broad-based education and awareness building to inform individuals about area-wide soil contamination and provide a toolbox of information to help individuals respond to it. The Task Force recommends a stepwise approach to education and awareness building that includes both general and targeted educational materials and outreach.
4. In addition to broad-based education and awareness building, where area-wide soil contamination is likely, the Task Force recommends a series of responses at child-use areas, including qualitative assessments to determine whether exposure is likely, best management practices (BMPs) to minimize exposure, soil sampling if exposure is likely, and, depending on the results of soil tests, additional protective measures. In some

cases, such as new school construction, sampling is recommended as an initial response, while a voluntary certification approach is recommended for addressing area-wide soil contamination at childcare facilities.

5. In addition to broad-based education and awareness building, in residential areas where area-wide soil contamination is likely, the Task Force recommends that residents implement BMPs to minimize potential exposure. Furthermore, the Task Force recommends that the chartering agencies should work with local health jurisdictions to provide residents with information, incentives, and opportunities for soil sampling and implementation of responses in addition to BMPs such as removing or containing contaminated soil and bringing in clean soil.
6. At commercial properties, which tend to be covered by impervious surfaces and are not frequently used by children, the Task Force recommends that no responses other than maintaining good soil cover are needed.
7. Responses to area-wide soil contamination should be implemented in a way that leverages existing processes and avoids listing individual properties under MTCA.

Nature and Extent of Area-Wide Soil Contamination

Task Force member Mike Wearne presented an overview of what we know about area-wide soil contamination, recommendations for using two tiers of maps to help people understand where area-wide soil contamination is likely, the importance of providing contextual information along with the maps, and recommendations for developing new maps and for updating existing maps. He described general tier 1 maps of areas potentially affected by lead arsenate pesticides and smelter emissions and more detailed tier 2 maps that are available for each smelter area and that have been developed in some localities to show the locations of historical orchards. (See meeting materials for details and for copies of the draft maps.)

Task Force members commented that counties may not have the same technical capabilities to develop maps and that it would be important for the State to provide funding to local governments to develop and update the maps. A few Task Force members also noted that detailed maps would be important for implementing an alternative approach to MTCA. Based on this discussion, Task Force members recommended the following changes to the draft text on nature and extent in the Task Force report:

- Note that maps have a variety of uses, including defining areas where an alternate MTCA approach would apply and helping the chartering agencies to prioritize and focus efforts to address area-wide soil contamination.
- Clarify the roles of State and local agencies in developing, maintaining, and updating the maps. The State should provide funding, information, and assistance to local governments for developing maps and has access to statewide GIS capability for updating and maintaining state maps.
- Mention (perhaps in the preamble to the Task Force report) that there are other sources of lead and arsenic (e.g., CCA treated wood, lead-based paint, and arsenic in drinking water) the Task Force did not address in the report.
- Reference that information should be made available to people through a variety of means in addition to access through the Internet.

In additions to these refinements, the Task Force recommended that the nature and extent subgroup consider any additional data gathering that should be done and develop recommendations for full Task Force consideration as necessary. In particular, Task Force members mentioned the need to consider whether additional recommendations should be made to address contamination from past use of leaded gasoline.

Alternative Route through MTCA for Area-Wide Contamination Areas

Task Force member Ray Paoella described the approach of the MTCA subgroup to develop an alternative, streamlined process through MTCA for area-wide soil contamination areas. The alternative pathway avoids listing individual properties, focuses attention on areas of concern, and encourages the implementation of recommended activities in different land-use scenarios. This alternate pathway through MTCA, which the subgroup illustrated using a highway analogy, involves the following four steps:

1. Identify and map areas that are likely or known to have low-to-moderate levels of arsenic and lead soil contamination and list these areas as potentially affected by area-wide soil contamination, but do not list individual properties within the areas on the Hazardous Sites List.
2. Support and encourage activities to address area-wide soil contamination in the identified areas, including broad-based education, activities recommended for the different scenarios (e.g., BMPs, assessments), and additional activities individuals choose to take (activities in the “rest area” separate from “highway MTCA”).
3. Protect property owners within the areas from application of MTCA liability and issue documents to resolve MTCA liability to property owners who implement additional cleanup actions (the “high-speed tram to cleanup land”).
4. In certain situations (e.g., if other contaminants are present, or upon request of the property owner), list individual properties under MTCA and proceed with the traditional MTCA cleanup process (an “on-ramp” to “highway MTCA”).

Subgroup members noted that developing this alternate route through MTCA would primarily involve regulatory and policy changes rather than changes to the MTCA statute. Ecology suggested that the Task Force consider using a term other than “rest area.”

The Task Force had a vigorous discussion about this alternate pathway through MTCA and raised a number of questions about how this approach would work in practice. In particular, Task Force members were concerned about whether the approach would create a bottleneck at a different part in the cleanup process. Questions Task Force members asked about the MTCA approach included the following.

- How should the chartering agencies engage members of the public in developing the boundaries of area-wide soil contamination areas? (The boundaries would probably be imprecise, would evolve over time, and would indicate areas of concern rather than implying that all land within the areas has elevated levels.)
- How should properties get off the traditional path through MTCA? Should it be automatic (e.g., if certain conditions are met) or optional?
- Should there be a way to resolve the potential for MTCA liability for property owners who sample soils and do not have contamination?

- Does being in a designated area-wide soil contamination area affect property owners' recourse for getting liable parties to pay for actions to address the contamination?
- How and when are properties in area-wide soil contamination areas tracked?
- What information would sellers be required to disclose to people buying properties within area-wide soil contamination areas? (Note that properties within these areas are not necessarily known to be contaminated; they are simply identified as potentially affected.)
- What kind of liability assurances would be provided while the recommended activities are being implemented (in the "rest area")?
- Is there a way to make the process self-executing so Ecology would not have to do something (e.g., issue a letter) for each property in area-wide soil contamination areas?
- How would the information and services be provided and funded to support activities to address area-wide soil contamination (in the "rest area")?
- Would different kinds of activities and support be required for different scenarios/situations (i.e., should there be more than one kind of "rest area")?
- How would people know whether the activities to address contamination in area-wide soil contamination areas (in the "rest area") are effective at managing exposures?
- What additional activities are needed (e.g., beyond BMPs) to clean up properties and receive liability assurance under MTCA?
- What kind of liability assurance would be provided once those additional activities are implemented (i.e., No Further Action letter or other means)?

Based on this discussion, the Task Force directed the MTCA subgroup to refine the alternate approach through MTCA to address these implementation issues and strive for an approach that would be both workable and useful. Task Force members also suggested that it would be helpful to discuss how this approach to MTCA and the activities the Task Force is discussing would work with examples of real-world situations. The presence of lead-based paint was noted as an example where disclosure is required but a statement such as a no further action (NFA) letter is not needed.

Approach to Commercial Areas

Task Force member Craig Trueblood reviewed the Task Force's recommendations for commercial areas, which had not changed since the last Task Force meeting, and described how these activities would work under the current MTCA process. The Task Force recommends that in commercial areas where impervious surfaces are in place, no further responses are needed. Task Force member Loren Dunn added that these are the same protective measures that are typically applied under the current MTCA process, but that there are usually also institutional controls and financial assurance mechanisms in place in the event that properties are transferred. To assure greater predictability in responses at commercial properties, a few Task Force members suggested this might be an area where the Department of Ecology (Ecology) should develop a model remedy; the MTCA subgroup will consider developing such a recommendation.

Agency Update on Other Arsenic and Lead Activities

Jim Pendowski of Ecology reviewed Ecology's recent activities related to arsenic and lead soil contamination, including sampling of child-use areas within the Tacoma smelter plume (where it has been difficult to get access agreements for sampling at daycare locations), the release of draft cleanup plans for the Weyerhaeuser-DuPont site in Pierce county, ongoing cleanup activities at Lincoln elementary school in Wenatchee, and plans for sampling of schools in Okanogan county. Mr. Pendowski also noted that Ecology had responded to the comments and concerns of the Washington State Farm Bureau about the area-wide project.

Dr. Jude Van Buren of the Department of Health described the Department's plans to address arsenic in drinking water (which is primarily from natural sources and affects less than 1% of the population) and develop a fact sheet addressing concerns from arsenic exposure from all sources. In addition, she gave an overview of several bills being considered by the State legislature regarding local governments' responsibilities to perform unfunded mandates (HSB 1651), redistribution of funds from schools to local health jurisdictions (HSB 1629), and statewide monitoring of childhood exposure to arsenic, mercury, and other contaminants (HSB 5264). Bob Arrington of the Department of Agriculture added that another bill being considered concerns training and certification for people working with lead-based paint (HSB 6586).

Approach to Child-Use Areas

Task Force co-chair Steve Gerritson provided an overview of the stepwise approach the Task Force is recommending for child-use areas. This approach includes broad-based education, qualitative assessments in areas where area-wide soil contamination is likely, implementation of BMPs and sampling if exposure is likely, and, depending on the sampling results, using additional protective measures. The Task Force also differentiated between new and existing playgrounds, and between private daycares and public playgrounds.

- For existing public playgrounds in areas where area-wide contamination is likely, the Task Force recommends using a permeable fabric barrier below surfacing material such as wood chips or pea gravel and maintaining soil cover in other play areas such as ball fields; these recommendations build on current guidelines for playground safety.
- For new construction of public playgrounds, the Task Force recommends that soils be tested and that any additional appropriate protective measures be incorporated into the construction plans and budget.
- Finally, for daycares, the Task Force has discussed a voluntary, tiered certification approach that would not require much involvement from the State but would rely on market forces to promote appropriate responses to contamination at licensed and unlicensed daycares.

Task Force members supported the overall approach to child-use areas, and asked several questions about how the daycare certification approach, in particular, would work in practice. A few Task Force members noted that since another State agency (the Department of Social and Health Services) and other actors would be involved with the certification approach for daycares, it will be important to consult with DSHS and the State Childcare Coordinating Committee about the draft recommendations. Furthermore, the Task Force may want to mention in its report that organizations that could help implement the recommendations may not be limited to those identified in the report.

Task Force members also had the following suggestions for the draft recommendations on child-use areas:

- The Task Force should either recommend requiring or strongly recommend that sampling occur prior to new school construction, depending on what would be practical and effective. Task Force member Marcia Riggers will explore with facilities staff about mechanisms (rules or other means) to ensure that the Task Force recommendations for sampling prior to new school playground construction would be implemented.
- The recommendations should allow the possibility of removing contaminated soil, as well as using BMPs and protective barriers.
- The recommendations should address issues of exposure at private schools and camps.

Approach to Residential Areas

Task Force member Craig Trueblood reviewed the overall approach the Task Force subgroups have discussed for existing residential areas; this approach focuses on helping residents understand and respond appropriately to area-wide soil contamination. Recommended responses include broad-based education and awareness building, best management practices (unless assessments show contaminated soil is not likely), qualitative assessments of potential exposure, and support for residents who choose to test soils and/or implement additional protective measures such as removing and replacing contaminated soil.

- Support for Soil Sampling: Mr. Trueblood reviewed and asked for Task Force feedback on several options to provide incentives and opportunities for residents who choose to test soils. Task Force members supported the idea of minimizing costs for sampling for residents, and suggested that the cost structure should be similar that of comparable environmental programs such as tests of drinking water quality. Task Force members stressed the importance of providing clear instructions and explanations to help residents collect samples and of putting the sampling results in the appropriate context to help residents understand and interpret the results. Furthermore, a few Task Force members suggested that landscaping contractors might be able to offer sampling as another service to residents.
- Data Confidentiality: With regard to confidentiality and reporting of results, Task Force members recommended that data from soil testing that individuals use to inform their decisions about appropriate responses should be kept confidential, and that the chartering agencies should provide incentives and opportunities for sampling in a way that prevents the data from becoming public. (Different approaches may be needed for sampling to confirm the presence or absence of contamination for property transactions, publicly owned lands, or other situations.)
- Protective Measures: Task Force members had a variety of comments and questions about protective measures that might be used. A few Task Force members questioned whether BMPs (depending on what specific activities are involved) are sufficient responses, and noted that people may be reluctant to implement practices that are not known to work and be cost effective. Others commented that the recommended responses should include support for installation of barriers, not simply support for soil removal (which could require a need for additional landfill capacity). One member suggested that the Task Force should

consider whether decisions about BMPs should be tied to the likelihood of exposure and the age of potentially exposed people.

- Identification of Replacement Soil: Task Force members discussed options for identifying or locating sources of soil that are at or below the cleanup standard for arsenic and lead, and suggested that the draft text be amended to indicate the purpose and scale (e.g., soil for garden beds) of any recommendation to develop a soil certification program. Task Force member emphasized that there is not enough “clean soil” to remove and replace soil for purposes other than gardens, for example. A few Task Force members mentioned that there have been similar issues with compost and that the biosolids program now includes sampling. Furthermore, Task Force members noted that there needs to be a method for getting rid of contaminated material and that the term “clean” should not be used if it refers only to arsenic and lead and not other contaminants.

Conceptual Approach to Vacant Land

Task Force member Craig Trueblood reviewed the approach the protective measures subgroup had discussed for vacant land. The subgroup decided to address ecological concerns separately from concerns about potential human exposure to arsenic and lead in soil at vacant land. Moreover, the group decided to develop recommendations for three main categories of vacant land:

- vacant land proposed for development
- vacant land not proposed for development in or near residential areas
- other vacant land not proposed for development

Vacant Land Proposed for Development

Task Force members discussed activities that should be taken at vacant land proposed for development and thought that, in general, the responses should be similar to those that are recommended for the proposed land use (e.g., child-use area, commercial property). In addition, Task Force members thought that site development plans should take advantage of opportunities to contain and cap soil under roads, structures, or landscaping berms during development. Furthermore, local land-use permitting tools may be important for ensuring that these activities are implemented. A few Task Force members suggested that the State should set an example by adopting these practices for its construction projects. Finally, Task Force members noted that clearing areas for development could generate a lot of dust, so the Task Force may want to include local clean air agencies in the Task Force’s recommendations. One Task Force member suggested that Brownfields monies be considered as a potential funding source for redevelopment.

Vacant Land Not Proposed for Development Not Near Residential Areas

Task Force members noted that broad-based education and awareness building activities would probably be sufficient to address human exposure at vacant land not proposed for development that is not near residential areas, but that additional responses would be needed to assure complete cleanup and liability relief under MTCA.

Vacant Land Not Proposed for Development In or Near Residential Areas

Beyond broad-based education and awareness building, Task Force members did not express many ideas at the meeting for responding to area-wide soil contamination at vacant land not proposed for development in or near residential areas. Task Force members noted that education programs may not be sufficient to keep children out of vacant land. Furthermore, Task Force members observed that there are a number of problems with abandoned orchards and that the Department of Agriculture has had some money to address them in the past.

During this discussion, a few Task Force members raised the issue of whether additional actions were needed to address exposure at agricultural land that is in production. Task Force members noted that agricultural land in production is not vacant land, and that exposure at picker camps should probably be addressed in the residential scenario. A few Task Force members asked for more information about the market-based system in place to ensure that root crops are not grown on former orchard soils.

Elizabeth McManus of Ross & Associates noted that although he was unable to attend the Task Force meeting, Task Force co-chair Steve Kelley believes that expanding real estate disclosure approaches for vacant land is an important piece of the solution.

Project Public Involvement Proposal and Schedule

Task Force co-chair Steve Gerritson gave a brief overview of the proposal for public involvement for the project, which has two specific targets: (1) stakeholders who will receive and have the opportunity to comment on written materials outlining the Task Force's recommendations and (2) focus groups so the Task Force can hear people's issues and concerns first hand. Task Force members are also encouraged to conduct additional outreach to their constituencies. Mr. Gerritson noted that the Task Force would benefit from hearing additional perspectives on its recommendations and that there is also a public responsibility to take this information out to a broader audience. Most of the public involvement activities including the focus groups will occur in May.

Task Force members supported the idea of placing newspaper ads in local newspapers as well as sending postcards to announce the availability of materials for review. Jim Pendowski of Ecology suggested that the agencies let elected leaders know that the focus groups and newspaper ads will be occurring so there are no surprises. Jude Van Buren of the Department of Health added that the Task Force should hear from those who have limited ability to influence their living situation, such as renters or people with very low income levels. The Task Force co-chairs have agreed to continue leading the public involvement effort from the Task Force's side.

Communication Report and Forecast

Task Force members had no communication activities to report at this meeting. Elizabeth McManus of Ross & Associates said that she hoped that everyone would have a forecast at the next Task Force meeting in anticipation of public outreach in May.

Public Comments

There were three opportunities for public comment provided during the meeting, during which the following comments were made.

- Sally Brown of the University of Washington noted that old houses and old roads are significant sources of lead contamination and described research she and others have been doing on methods to reduce the bioavailability of lead so that it is not taken up by animals. She described how different types of lead are not equally available if ingested and that adding phosphorus and other amendments to soil can reduce lead bioavailability. The Task Force could recommend management practices that eliminate pathways of exposure or that use soil amendments to reduce the availability of contaminants. Furthermore, she suggested that the Task Force consider orienting its recommendations to focus on public health, for example, by recommending a blood or urine test if there is an elevated soil level to see whether children are being exposed.
- Bonnie Meyer of Public Health – Seattle & King County noted that maps, if developed, should be accurate and scientifically defensible. She said that King County has not determined the full extent or footprint of contamination through sampling. Furthermore, there is a concern that residents assume that nothing is wrong if they are not being required to take actions, but the only ways of evaluating whether residents are taking actions would be very invasive. She noted that there was a conference on environmental health held last month for childcare providers that was well attended and did not require money from Ecology. The guidelines for reducing exposure that King County uses do not include the full range of options for remediation and cleanup, but it would be helpful to have recommendations from the Department of Ecology about additional protective measures.
- Greg Wingard of the Regional Coalition on Airport Affairs described a number of concerns with how the Department of Ecology is addressing area-wide soil contamination. He noted that Ecology has suspended enforcement at places where contamination is known to exist, that nothing is being done to monitor or address particulate air pollution from construction activities in soil with heavy metals, that the interim action levels are not protective of human health, and that Ecology did not consider the arsenic and lead contamination under SEPA or NEPA in regard to airport construction. He said that it is unacceptable that there is large scale construction occurring in or near residential areas, where the number of people exposed is high and concentrations of contaminants are high.
- Karen Pickett of Asarco said that there are different opinions on the health issue and that treating soils to reduce bioavailability is not available as an option under MTCA currently. In terms of effectiveness studies, both what is being studied (e.g., behavior change, how frequently materials are distributed, or urinary arsenic) and how it is measured are important. She said that is unfair to have different recommendations for areas where there is a known responsible party than for other areas. She described how asking Asarco to pay for responses to low-to-moderate level soil contamination would not be a fair approach and would drive the company into bankruptcy, as it is already spending millions of dollars to address high-level contamination.
- Cathea Stanley, a local resident and volunteer with the Sierra Club, said that she is worried about the dirt and dust from airport construction in her neighborhood and about where dirt from borrow pits is going to be put. She noted that kids play in backyards all the time and could be exposed to contaminated soil as well as blowing dirt and dust.
- Dan Schueler of the Vashon-Maury Island Community Council observed that May Gerstle had asked Ecology before for a list of clean sources of soil. He said that providing a list of suppliers for people who want small amounts of clean soil seems like a reasonable request.

- Becky Stanley, a botanist, local resident, and Sierra Club volunteer, commented that plants do uptake arsenic and lead, although they may convert the contaminants into a less toxic form. Madrona and Douglas fir trees, for example, take up arsenic in their leaves, so leaf litter and compost derived from it could be contaminated. Addressing liability issues may be different for people living within a smelter plume than for farmers. Ms. Stanley further suggested that when placing contaminated soil under roads and other structures, it is important to make sure the contaminants will not leach into drinking water aquifers. Furthermore, dust generated when people are developing should be addressed. Finally, she suggested making advertisements for the public involvement materials user friendly and engaging.
- Don Abbott of the Department of Ecology said that MTCA does not differentiate between species of lead and arsenic and that it does not matter whether the contaminants are in organic or inorganic forms.

Next Steps

- The facilitation team will be in touch with Task Force members to schedule and help prepare for conference calls for the nature and extent, protective measures, institutional frameworks/funding, and MTCA subgroups.
- The project team will work with the Task Force co-chairs to oversee the public involvement effort for the project.
- The nature and extent subgroup will review the remaining tier 1 maps under development, clarify the recommendations for developing and updating maps in the draft text, discuss any recommendations for data gathering, and develop additional text on roadside lead contamination.
- The protective measures subgroup will continue its discussion of the vacant land scenario and real estate disclosure approaches and will clarify the activities that are considered best management practices.
- The institutional frameworks / funding subgroup will continue to refine the draft text and recommendations for child-use areas and residential areas, consider implementation issues for the vacant land scenario, and explore funding options for Task Force recommendations.
- The MTCA subgroup will continue to discuss and refine the alternate approach through MTCA for area-wide soil contamination areas to address implementation issues. The MTCA subgroup will also discuss recommending a model remedy for commercial areas and the “crosswalk” with MTCA for other activities the Task Force is considering.
- The next Task Force meeting will be on **April 24, 2003 in Wenatchee**. Most of the project public involvement activities will occur in May, and the final Task Force meetings will be on June 2 and June 16.

Meeting Materials

- Agenda
- Summary of the January 16, 2002 Task Force meeting
- Task Force subgroup roster
- Partial draft Task Force report
- Nature and Extent of Area-Wide Soil Contamination presentation

- Draft mock up of Area-Wide Soil Contamination Toolbox
- Sampling guidance summary
- Residential Sampling Guidance
- Child-Use Area Sampling Guidance
- Planning an “Alternate Route” through MTCA presentation
- Diagram of alternate route through MTCA
- Commercial Areas presentation
- Department of Ecology Associated Lead and Arsenic Related Activities and Communications Update handout
- Task Force Recommendations: Child-Use Areas presentation
- Residential Areas presentation
- Conceptual Approach to Vacant Land Scenario presentation
- Conceptual Approach to Vacant Land bullet points
- Protective Measures Evaluation Summary table
- Public Involvement Proposal presentation
- Draft Public Involvement Proposal
- Draft Schedule for Public Involvement Activities
- Suggestion form for stakeholders and focus groups

Members in Attendance

Bob Arrington, Washington State Department of Agriculture
 Katherine Bridwell, SAFECO
 Loren Dunn, Riddell Williams for Washington Environmental Council
 Steve Gerritson, Sierra Club
 Jim Hazen, Washington Horticultural Association
 Scott McKinnie, Far West Agribusiness Association
 Ray Paoletta, City of Yakima
 Jim Pendowski, Washington State Department of Ecology
 Marcia Riggers, Washington State Office of the Superintendent of Public Instruction
 Craig Trueblood, Preston Gates & Ellis
 Jude Van Buren, Washington State Department of Health
 Mike Wearne, Washington Mutual Bank

Members Unable to Attend

Jon DeJong, Wenatchee School District
 Ted Gage, Washington State Office of Community Development
 Steve Kelley, Windermere Real Estate, Wenatchee
 Steve Marek, Tacoma/Pierce County Health Department
 Laura Mrachek, Cascade Analytical
 Frank Peryea, Washington State University Tree Fruit Research and Extension Center
 Randy Phillips, Chelan-Douglas Health District
 Paul Roberts, City of Everett
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